

Norm Covell  
AIR POLLUTION CONTROL OFFICER

September 24, 2002

Ms. Linda Bluestein  
Office of Energy Efficiency and Renewable Energy  
Office of FreedomCAR and Vehicle Technologies  
Docket No. EE-RM-02-200, EE=2G  
1000 Independence Avenue, SW  
Washington, DC 20585-0121

Dear Ms. Bluestein:

The Sacramento Metropolitan Air Quality Management District (SMAQMD) would like to strongly support the use of Fischer-Tropsch Diesel Fuel (FTD) as an ALTERNATIVE FUEL under the Energy Policy Act of 1992.

The SMAQMD, as a health-based agency, is primarily concerned with reducing criteria pollutants not energy security. However, we are always looking for the areas where the two overlap. FTD appears to be just such an area.

Less than 10% of all diesel vehicles and equipment are owned by government agencies and public utilities and therefore subject to EPACT. Most of the diesels that operate every day in our cities, on our highways, in the fields and at construction sites are owned by private individuals or private companies. These diesel engine users need practical, easy-to-implement solutions in order to reduce emissions. Consider the windfall for energy security if that solution also provides for a more diverse energy base. FTD provides just such a windfall.

The SMAQMD has worked closely with the California Energy Commission (CEC) and the California Department of Transportation (Caltrans) in support of the use of FTD demonstration programs. Although these programs have been small in scale, it is clear that FTD offers an excellent opportunity to diesel fleet operators to reduce emissions. To date, the use of FTD in existing diesel engines has proved successful – in fact completely transparent to vehicle operators. Further, emission testing on FTD shows modest reductions in all criteria pollutants. In fact, the technologies to virtually eliminate hydrocarbons, carbon monoxide, particulates and toxic emissions on diesel engines using FTD exist today and the technologies to virtually eliminate NOx are developing very quickly.

The SMAQMD urges the DOE to act quickly and favorably on the issue of declaring FTD as an ALTERNATIVE FUEL under EPACT. Your favorable action will benefit energy security and air quality and will greatly simplify compliance by fleets governed by EPACT requirements. And, by enhancing the availability of FTD, a much broader range of diesel vehicles and equipment can be encouraged to use the fuel, reduce emissions and simultaneously diversify the nations energy supply base.

Thank you for your attention to this matter.

Sincerely,



Norm Covell

Air Pollution Control Officer  
Sacramento Metropolitan  
Air Quality Management District